

SLT:NR/TJS

F.#2013R01090/OCDETF#NY-NYE-703

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

LEON CAMPBELL,  
also known as "Country," and  
RONALD WILLIAMS,  
also known as "Blackman,"  
"Jermaine," "Leon Gordon"  
and "Marcus Reese,"

Defendants.

S U P E R  
I N D I C T M E N T

Cr. No. 13-419 (S-1) (DLI)  
(T. 18, U.S.C., §§ 373,  
922(g)(1), 924(a)(2),  
924(c)(1)(A)(i)  
924(d), 981(a)(1)(C),  
1512(a)(3)(B)(i),  
1512(k), 1958(a), 2 and  
3551 et seq.; T. 21,  
U.S.C., §§ 841(b)(1)(C),  
846, 853(a) and 853(p);  
T. 28, U.S.C., § 2461(c))

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THE GRAND JURY CHARGES:

COUNT ONE

(Marijuana Distribution Conspiracy)

1. On or about and between March 12, 2013 and August 6, 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LEON CAMPBELL, also known as "Country," and RONALD WILLIAMS, also known as "Blackman," "Jermaine," "Leon Gordon" and "Marcus Reese," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 50 kilograms or more of a substance containing marijuana, a Schedule I

controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO  
(Conspiracy to Commit Obstruction of Justice Murder)

2. On or about April 30, 2013, within the Eastern District of New York and elsewhere, the defendants LEON CAMPBELL, also known as "Country," and RONALD WILLIAMS, also known as "Blackman," "Jermaine," "Leon Gordon" and "Marcus Reese," together with others, did knowingly and intentionally conspire to kill another person, to wit: John Doe, an individual whose identity is known to the Grand Jury, with intent to prevent the communication by such person to a law enforcement officer of the United States of information relating to the commission and possible commission of a federal offenses, to wit: the crime charged in Count One, contrary to Title 18, United States Code, Section 1512(a)(1)(C).

(Title 18, United States Code, Sections 1512(k), 1512(a)(3)(B)(i), and 3551 et seq.)

COUNT THREE  
(Murder-for-Hire Conspiracy)

3. On or about April 30, 2013, within the Eastern District of New York and elsewhere, the defendants LEON

CAMPBELL, also known as "Country," and RONALD WILLIAMS, also known as "Blackman," "Jermaine," "Leon Gordon" and "Marcus Reese," together with others, did knowingly and intentionally conspire to use and cause another to use a facility of interstate commerce, to wit: a telephone, with intent that the murder of John Doe be committed, in violation of Section 125.25 of New York State Penal Law, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(Title 18, United States Code, Sections 1958(a) and 3551 et seq.)

COUNT FOUR  
(Solicitation of Murder)

4. On or about April 30, 2013, within the Eastern District of New York and elsewhere, the defendant LEON CAMPBELL, also known as "Country," with intent that one or more other persons engage in conduct constituting a felony that has as an element the use, attempted use and threatened use of physical force against the person of another, to wit: John Doe, in violation of the laws of the United States, to wit: Title 18, United States Code, Sections 1512 and 1958, and under circumstances strongly corroborative of that intent, did knowingly and intentionally solicit, command, induce and

otherwise endeavor to persuade such other persons to engage in such conduct.

(Title 18, United States Code, Sections 373 and 3551 et seq.)

COUNT FIVE  
(Felon in Possession of Firearms)

5. On or about August 6, 2013, within the Eastern District of New York, the defendant RONALD WILLIAMS, also known as "Blackman," "Jermaine," "Leon Gordon" and "Marcus Reese," having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce one or more firearms, to wit: a Smith & Wesson .40 caliber handgun, model 40ve with a defaced serial number, a Raven Arms .25 caliber handgun, model-MP25 with serial number 1382875, a Smith & Wesson .22 caliber handgun, model 41 with serial number A117126, and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

COUNT SIX

(Use of Firearms in Connection with Drug  
Trafficking Crime and Crimes of Violence)

6. On or about and between March 12, 2013 and August 6, 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LEON CAMPBELL, also known as "Country," and RONALD WILLIAMS, also known as "Blackman," "Jermaine," "Leon Gordon" and "Marcus Reese," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a drug trafficking crime, to wit: the crime charged in Count One, and one or more crimes of violence, to wit: the crimes charged in Counts Two and Three, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crime and crimes of violence.

(Title 18, United States Code, Sections  
924(c)(1)(A)(i), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

7. The United States hereby gives notice to the defendants that, upon conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of any such offense, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;  
or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS TWO AND THREE

9. The United States hereby gives notice to the defendants that, upon conviction of any of the offenses charged in Counts Two and Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property constituting or derived from proceeds traceable to such offenses.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;  
or

(e) has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS FIVE AND SIX

11. The United States hereby gives notice to the defendants charged in Counts Five and Six that, upon conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g) or 924(c), including but not limited to: a Smith & Wesson .40 caliber handgun, model 40ve with a defaced serial number, a Raven Arms .25 caliber handgun, model-MP25 with serial number 1382875, a Smith & Wesson .22 caliber handgun, model 41 with



serial number A117126, and ammunition, recovered on or about August 6, 2013 in Brooklyn, New York.

12. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;  
or

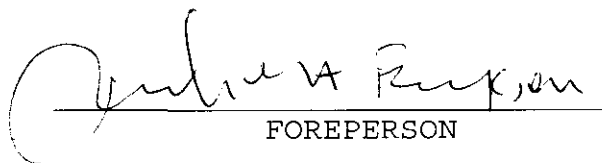
(e) has been commingled with other property which cannot be divided without difficulty;

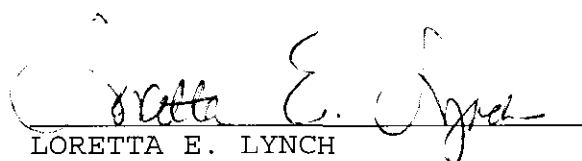
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

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**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

vs.

*LEON CAMPBELL and RONALD WILLIAMS,*

Defendants.

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**INDICTMENT**

(T. 18, U.S.C. §§ 373, 922(g)(1), 924(a)(2), 924(c)(1)(A)(I),  
924(d), 981(a)(1), 1512(a)(3)(B)(I), 1512(k), 1958(a), 2 and 3551 et seq.,  
T.21, U.S.C. §§ 841(b)(1)(C), 846, and 853, T. 28, U.S.C. § 2461 )

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*A true bill.*

*Richard J. Fung*

Foreman

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Filed in open court this \_\_\_\_\_ day, of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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*Steven L. Tiscione, Assistant U.S. Attorney (718-254-6317)*